

GUTRIDE SAFIER LLP

ADAM J. GUTRIDE (State Bar No. 181446)
SETH A. SAFIER (State Bar No. 197427)
KRISTEN SIMPLICIO (State Bar No. 263291)
ANTHONY PATEK (State Bar No. 228964)
100 Pine Street, Suite 1250
San Francisco, California 94111
Telephone: (415) 639-9090
Facsimile: (415) 449-6469
adam@gutridesafier.com
seth@gutridesafier.com
kristen@gutridesafier.com
anthony@gutridesafier.com

UREKA E. IDSTROM (*pro hac vice*)
THE EUREKA LAW FIRM
5606 Belinder Road
Fairway, KS 66205
Telephone: (816) 665-3515
Email: uidstrom@eurekalawfirm.com

Attorneys for Plaintiff and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ERIN ALLEN, OFELIA FRECHETTE,
SHELLEY HARDER,
DEANA MARR, TAMMIE SHAWLEY,
BRIAN SMITH, AND BETTY VAZQUEZ,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CONAGRA FOODS INC., a Delaware
Corporation,

Defendant.

CASE NO. 3:13-CV-01279-WHO

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CLASS
CERTIFICATION BRIEFING AND
HEARING**

1 Pursuant to Civil Local Rule 6-2(b), Plaintiffs and Defendant Conagra Foods Inc., a
2 Delaware Corporation (“Defendant), through their undersigned counsel, hereby stipulate as
3 follows:

4 WHEREAS, Plaintiffs’ filed their renewed motion for class certification on March 1, 2019
5 (dkt. # 240, 241) and Defendant filed its opposition to that motion on April 1, 2019 (dkt. # 252);

6 WHEREAS, pursuant to this Court’s order during the September 25, 2018 Case
7 Management Conference, Plaintiffs’ reply brief is due May 1, 2019 and the hearing is scheduled
8 for May15, 2019 at 2:00 p.m.

9 WHEREAS, in support of its opposition, Defendant submitted declarations from two
10 experts, whom Plaintiffs wish to depose prior to filing their reply brief;

11 WHEREAS, one of those witnesses is based in Dallas, Texas, and due to conflicting
12 schedules, the soonest mutually agreeable date for his deposition is May 14, 2019;

13 WHEREAS, the parties have agreed that Plaintiffs’ time to file their reply brief shall be
14 continued to May 22, 2019, and the hearing should be continued to June 5, 2019 at 2:00 p.m.;

15 WHEREAS the extension will not alter the date of any other deadlines in this matter;

16 WHEREAS, this is the first extension requested on this motion since September 25, 2018
17 Case Management Conference;

18 IT IS HEREBY STIPULATED AND AGREED by the parties, through their counsel, that
19 pursuant to Local Rule 6-1(a), Plaintiffs’ time to file their reply in support of their renewed
20 motion for class certification shall be extended from May 1 to May 22, 2019, and the hearing on
21 that motion shall be continued from May 15, 2019 to June 5, 2019.
22
23
24
25
26
27
28

STIPULATED AND AGREED:

GUTRIDE SAFIER LLP

Adam J. Gutride
Kristen Simplicio
Anthony Patek
100 Pine Street, Suite 1250
San Francisco, CA 94111
Telephone: (415) 271-6469
Facsimile: (515) 449-6469
adam@gutridesafier.com
kristen@gutridesafier.com
anthony@gutridesafier.com

THE EUREKA LAW FIRM

UREKA E. IDSTROM (*pro hac vice*)
5606 Belinder Road
Fairway, KS 66205
Telephone: (816) 665-3515
Email: uidstrom@eurekalawfirm.com

*Attorneys for
Plaintiffs*

ALSTON & BIRD LLP

Angela M. Spivey (*pro hac vice*)
Andrew Phillips
Jamie George
One Atlantic Center
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
aspivey@alston.com
andrew.phillips@alston.com
jamie.george@alston.com

*Attorneys for
Conagra Foods, Inc.*

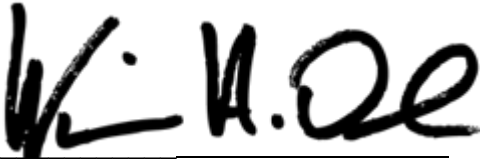
PROPOSED ORDER

Pursuant to Civil Local Rule 6-2(b), and **GOOD CAUSE APPEARING THEREFOR**, it is therefore ORDERED that:

Plaintiffs' time to file their reply in support of their renewed motion for class certification shall be extended from May 1 to May 22, 2019, and the hearing on that motion shall be continued from May 15, 2019 to June 5, 2019.

IT IS SO ORDERED.

DATED: April 24, 2019


THE HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION OF COMPLIANCE

I, Kristen Simplicio, am the ECF user whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Andrew Phillips concurred in this filing.

/s/ Kristen Simplicio